

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DISTRICT – BAY CITY**

In re:

Chapter 11

TREETOPS ACQUISITION COMPANY, LLC,

Case No. 14-22602-dob

Debtor.

Hon. Daniel S. Opperman

**STIPULATION FOR ENTRY OF SECOND ORDER REGARDING
ADJOURNMENT OF HEARING ON FINAL APPROVAL OF THE
DISCLOSURE STATEMENT AND CONFIRMATION OF THE PLAN OF
REORGANIZATION OF TREETOPS ACQUISITION COMPANY, LLC**

Treetops Acquisition Company, LLC, as debtor and debtor-in-possession in the above-captioned chapter 11 case, the Official Committee of Unsecured Creditors, Otsego County Treasurer, the United States Trustee, Melling Resorts International, Inc. and Melling Tool Co., by and through their undersigned counsel, hereby stipulate to entry of the proposed Second Order attached hereto as **Exhibit 1**, and respectfully request that the Court enter such proposed Order.

Dated: February __, 2015

KERR, RUSSELL AND WEBER, PLC

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EXHIBIT 1

Proposed Order

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**SECOND ORDER ADJOURNING HEARING ON FINAL APPROVAL
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REORGANIZATION OF TREETOPS ACQUISITION COMPANY, LLC**

Upon the stipulation of Treetops Acquisition Company, LLC, as debtor and debtor-in-possession in the above-captioned chapter 11 case (the "Debtor"), the Official Committee of Unsecured Creditors (the "Committee"), Otsego County Treasurer, the United States Trustee and Melling Resorts International, Inc. and Melling Tool Co., for entry of a second order (i) extending the deadline for the Committee to file and serve any objection to approval of the disclosure statement and confirmation of the plan (an "Objection") and (ii) adjourning the hearing on final approval of the disclosure statement and confirmation of the plan (the "Confirmation Hearing"), as set forth in this Court's *Order Granting Preliminary Approval of the Disclosure Statement and Scheduling Confirmation Hearing* [Docket No. 53] (the "January 5 Order"); and the Court being fully advised in the premises;

THE COURT HEREBY ORDERS that:

1. The Confirmation Hearing (at which time the Court will consider final approval of the disclosure statement and confirmation of the plan) is adjourned to, and will be held on, **March 12, 2015 at 1:30 p.m.** in the U.S. Bankruptcy Courtroom, 111 First Street, Bay City, Michigan 48708.

2. Any Objection must be (a) filed with the Court and (b) served upon the Debtor no later than 5:00 p.m. on March 9, 2015 (the "Extended Deadline"). The Extended Deadline shall apply only to the Committee. The deadline for any other party in interest to file and serve any objections to final approval of the disclosure statement or confirmation of the plan shall remain February 5, 2015, pursuant to and in accordance with the January 5 Order.

3. The deadline for all professionals to file final fee applications shall be extended to March 26, 2015.

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